

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 08 CR 276
vs.	)	
	)	Judge Blanche M. Manning
WILLIAM COZZI	)	

**GOVERNMENT'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE RESPONSE BRIEF**

The United States of America, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, respectfully moves this Court to grant the government up to and including August 8, 2008, to respond to defendant's pretrial motions. In support of its motion, the government states as follows:

1. On June 2, 2008, defendant filed pretrial motions seeking: (a) a taint hearing; (b) a vindictive prosecution hearing; (c) discovery related to the requested taint hearing; and (d) dismissal of the indictment.

2. The government's response to the pretrial motions is currently due on July 25, 2008. The government seeks an extension up to and including August 8, 2008, to file its response.

3. Defendant's motions raise complex legal issues that the government is currently researching. The government seeks additional time to continue researching the issues raised in the motions and prepare a proper response.

4. Scott R. Drury, one of the attorneys prosecuting the case, has been on trial in the matter of *United States v. Loniello, et al.*, 07 CR 336, since July 14, 2008, and, as a result, has not been able to work on preparing the government's response. The trial is ongoing.

5. The government has spoken with Terrence Gillespie, counsel for defendant. Mr. Gillespie has no objection to the government's motion.

6. Defendant is not in custody.

WHEREFORE, the United States of America respectfully requests that this Court enter an order granting the government up to and including August 8, 2008, to file its response to defendant's pretrial motions.

Dated: July 23, 2008

Respectfully submitted,  
PATRICK J. FITZGERALD  
United States Attorney

By: Scott R. Drury/s  
SCOTT DRURY  
Assistant United States Attorney  
BETSY BIFFL  
Trial Attorney, DOJ Civil Rights Division  
219 South Dearborn Street  
Chicago, Illinois 60604  
(312) 353-1416

**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that the following document:

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was served on July 23, 2008, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

Scott R. Drury/s

SCOTT DRURY

Assistant United States Attorney

BETSY BIFFL

Trial Attorney, DOJ Civil Rights Division

219 South Dearborn Street

Chicago, Illinois 60604